

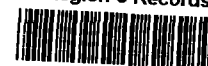
DATE:

25, 1981

RECEIVED

MAR 30 1981

EPA Region 5 Records Ctr.



393595

TO:

Division File ✓

FROM:

Pamela D. LoPinto

E.P.A. — D.L.P.C.
STATE OF ILLINOISSUBJECT: USEPA IS Inspection of Winnebago County, Rockford/Rockford
Products Corp. (Plant #3), 707 Kishwaukee St, Rockford, IL 61101US EPA ID# ILD00005895 ^{0052/2097}
IEPA Registration EDP 20103031

I visited this facility on 3-12-81 and 3-24-81. On 3-13-81 I met with Larry Hammond and Dick Giesen and we spent the afternoon completing inspection reports. On 3-24-81 I met with Larry Hammond and Steve Reid. I completed the inspection, on this day, by reviewing manifests, obtaining copies of relevant information and touring the facility.

Rockford Products Corp. manufactures and plates screws. The Corp. has three plants in Rockford. Plant #1 is involved with packaging of screws. Plant #2 generates, treats, and transports hazardous wastes. Plant 2 has a separate USEPA ID# and is described in a separate inspection report. Plant 3, the subject of this report, generates, "stores", treats and incinerates hazardous wastes. The hazardous wastes generated are plating wastes and heat quench oils.

Steve Reid and Larry Hammond escorted me through the facility. Although the facility appears to be exempt from needing a permit to treat, this process was explained to me. Plating wastes are collected in pits, pre-treated and final-treated. A two stage Pfaudler cyanide evaporator is employed and has a 400 gallon/hr capacity. In the pre-treatment room, cyanide is destroyed with chlorine, and chrome is destroyed with SO₂. Bottled chlorine and SO₂ are kept in a separate room and are labeled. The neutralized wastes are pumped via overhead PVC lined pipes to the secondary treatment area at the rear of the facility. The pH is maintained at 8.5 allowing the heavy metals to settle out. Water is reused in the facility and the resultant sludge is stored outside in an open Browning Ferris Industries container (photographed). The sludge consists primarily of lime, zinc and iron and is analyzed monthly. All rooms are diked and no plating wastes are discharged to the Sanitary District. All equipment is fully automated and problems with treatment results in a shutdown of the plating process. B.F.I. hauls away approximately 20 yds/week to their landfill in Ogle County.

The Illinois manifest is used. The waste name "Water Treatment Sludge" is typed on manifests, however, no DOT shipping description or hazard class is included. "Chip Conveyor Waste Oil" is manifested to Interstate Pollution Control. The DOT shipping description is "Waste Oil" and the hazard class is "Combustible." Wastes from Plant 2 are stored, and/or

ated at Plant 3. No manifest is used.
II. P.C.B. Opinion that the two plants are considered to be one site. The plants are on opposite corners of the intersection of two four-lane highways.

An incinerator is located adjacent to the BFI Sludge Disposal unit. It is housed in a shed and consumes approximately 35 gallons/hr of waste. The waste is a mixture containing approximately 85 % quench oil and 15 % miscellaneous plating sludges. Wastes are fed into an open cup burner. The incinerator has a 3 stage scrubber system. Waste Flow, Air Flow and Fuel Feed are all locked into temperature. The steady state temperature is 2200°F. Wastes were analyzed 3 times in the last 5 years at a cost of \$2200/analysis.

Rockford Products has applied for a storage permit although the facility appears to be exempt. Oils are stored in underground tanks outside, and are incinerated within a month. Waste water treatment sludges do not accumulate for longer than one month. Plating sludges and oils are also stored in covered barrels. Three separate areas contain cyanide, oils and copper (reactive with acid). The only area lacking fencing is the cyanide containing sludge area. Placards warn that these are hazardous areas. The storage area is approximately 400' from the property line and is enclosed within the facility (see attached plan sheets).

Attachments: IPCB Opinion and Order
Contingency and Emergency Procedure Plan
Equipment Inspection Schedule
Fire Protection Inspection Schedule
Tank Inspection Schedule
Waste Analysis Plan
Various plan sheets

PDL:lab

cc: Division File
Rockford Region